

UNITED STATES DISTRICT COURT

Plaintiff,

Civil Action No.: 6:24-cv-41-NKM

Defendant.

PLAINTIFF'S MOTION TO COMPEL DISCOVERY

COMES NOW Plaintiff, pursuant to Fed. R. Civ. P. 37, and hereby moves the Court for an

Date: March 7, 2025

Respectfully Submitted,

ELLENOR ZINSKI

/s/ Paul M. Falabella

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 7, 2025, the foregoing was sent to all counsel of record via the Court's electronic CM/ECF system.

/s/ Paul M. Falabella
Paul M. Falabella (VSB No. 81199)